

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER
LOWER MANHATTAN DISASTER
SITE LITIGATION

21MC102(AKH)

HERMAN FRANCO,

08CV2621(AKH)

Plaintiff(s),

-against-

80 LAFAYETTE ASSOCIATES LLC, et al.,

Defendants.

**NOTICE OF ADOPTION BY
MAYORE ESTATES LLC, 80
LAFAYETTE ASSOCIATES
LLC, MAYORE ESTATES
LLC, and 80 LAFAYETTE
ASSOCIATION LLC, AS
TENANTS IN COMMON OF
ANSWER TO MASTER
COMPLAINT**

PLEASE TAKE NOTICE that defendant **NOTICE OF ADOPTION BY MAYORE ESTATES LLC, 80 LAFAYETTE ASSOCIATES LLC, MAYORE ESTATES LLC, and 80 LAFAYETTE ASSOCIATION LLC, AS TENANTS IN COMMON** for the building located at 22 Cortlandt Street (Subcellar Floors 1, 2, 3, and Floors 1, 2, 3) New York, New York 10007, (hereinafter “Mayore Estates/80 Lafayette”) as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint adding new defendants not previously served filed in the above-referenced action, herein adopts Mayore Estates/80 Lafayette’s Answer to Master Complaint dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH). **MAYORE ESTATES/80 LAFAYETTE** has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (¶ J(2)).

PLEASE TAKE FURTHER NOTICE THAT defendant, Mayore Estates/80 Lafayette reserves its right to assert any defenses to which it is entitled, including but not limited to those enumerated in Case Management Order No. 4 (§§ D(1)-(5)).

WHEREFORE, Mayore Estates/80 Lafayette demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York
April 26, 2008

HARRIS BEACH PLLC

Attorneys for Defendant

**MAYORE ESTATES LLC, 80 LAFAYETTE
ASSOCIATES LLC, MAYORE ESTATES
LLC, and 80 LAFAYETTE ASSOCIATION
LLC, AS TENANTS IN COMMON**

/s/

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Liaison Counsel for the Defendants

All Counsel via ECF

CERTIFICATION AS TO SERVICE

The undersigned certifies that on April 26, 2008, I caused to be filed and served the following document electronically via the Court's ECF system upon the parties:

1. Notice of Adoption by Mayore Estates LLC, 80 Lafayette Associates LLC, Mayore Estates LLC, And 80 Lafayette Association LLC, as Tenants in Common of Answer to Master Complaint.

Dated: April 26, 2008

/s/
Stanley Goos, Esq. (SG 7062)